

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILL DIVISION**

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|---------------------------------|---|---------------------------|
| UNITED STATES OF AMERICA | § | |
| | § | |
| v. | § | NO. 1:12-CR-435-S1 |
| | § | |
| TOMAS YARRINGTON | § | |
| RUVALCABA | § | |

AGREED MOTION TO CONTINUE SETTINGS

**TO THE HONORABLE HILDA G. TAGLE, UNITED STATES
DISTRICT JUDGE:**

Now comes TOMAS YARRINGTON RUVALCABA, Defendant, by and through his attorneys, Chris Flood and Mervyn M. Mosbacker Jr., and respectfully requests that the Court continue the settings in this case. In support of this motion, Defendant respectfully presents the following:

1. On December 17, 2019, this Court granted Defendant's Unopposed Motion to Continue Settings, as follows: Motions Filing due by January 10, 2020; Response to Motions due by January 30, 2020; Motion Hearing on March 4, 2020; Final Pretrial Conference on April 14, 2020; Jury Selection on April 21, 2020; and Jury Trial on April 22, 2020.

2. Counsel for Defendant have continued reviewing discovery, and the Government has recently agreed to scan the discovery materials into an electronic format, which will take some time. This will assist Counsel in

disclosing and discussing the discovery materials with the Defendant. Additional time will be needed, once this process is completed, to evaluate what pretrial motions should be filed. Assistant U.S. Attorney Jody Young has agreed to the need to continue settings.

Defendant respectfully requests an eight-week extension to file pretrial motions and suggests the following dates for other deadlines, consistent with the Court's schedule:

- Motions Filing due by : March 6, 2020
- Response to Motions due by: March 26, 2020
- Motion Hearing: April 14, 2020
- Final Pretrial Conference: May 26, 2020
- Jury Selection: June 2, 2020
- Jury Trial: June 3, 2020

4. Counsel have conferred with Assistant U.S. Attorney Jody Young who states the United States has agreed to this motion.

Respectfully submitted,

/s/Chris Flood

Chris Flood

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/s/ Mervyn M. Mosbacker Jr.
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CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2020 I sent a copy of this motion
via e-mail:

Jody Young
Assistant U.S. Attorney
600 East Harrison Street
Brownsville, Texas 78520

/s/Mervyn M. Mosbacker Jr.
Mervyn M. Mosbacker Jr.

CERTIFICATE OF CONFERENCE

I hereby certify that on January 8, 2020 I conferred with Assistant
U.S. Attorneys Jody Young regarding this Agreed Motion to Continue
Settings, who indicated that he agrees to the motion.

/s/Mervyn M. Mosbacker Jr.
Mervyn M. Mosbacker Jr.